



September 15, 2017  
Project No. 8128.02.02

Dana Bayuk  
Oregon Department of Environmental Quality  
Northwest Region  
700 NE Multnomah Street, Suite 600  
Portland, Oregon 97232

Re: Monthly Progress Report—August 2017  
Siltronic Corporation  
7200 NW Front Avenue, Portland, OR  
Order No. ECVC-NWR-00-27

Dear Dana:

The Order Requiring Remedial Investigation and Source Control Measures, Oregon Department of Environmental Quality (DEQ) No. ECVC-NWR-00-27, issued by DEQ to Siltronic Corporation (Siltronic) and NW Natural (NWN) on October 4, 2000 (the 2000 Joint Order), requires submittal of monthly progress reports. This progress report encompasses the reporting period spanning August 1, 2017 through August 31, 2017. The next progress report is due October 15, 2017.

Because the 2000 Joint Order and the 2016 Unilateral Order (No. OPSR-NWR-16-02, issued to Siltronic on August 16, 2016 [2016 UAO]) have overlapping requirements on the Siltronic Operable Unit (SOU), Siltronic has previously sought to confirm that the Stormwater Source Control Evaluation (SSCE)<sup>1</sup> work on the SOU met the needs of both the 2000 Joint Order and the 2016 UAO. In a letter dated February 15, 2017, DEQ requested that Siltronic compile all SSCE work into a single work plan. As such, future work related to the SSCE will be provided in this monthly progress report related to the 2000 Joint Order. In doing so, unless DEQ instructs otherwise, Siltronic will proceed under the notion that this reporting regime will concurrently satisfy any overlapping requirements shared between the 2000 Joint Order and 2016 Unilateral Order concerning activities undertaken on the SOU, while also meeting DEQ's request that the SSCE work be conducted under a single work plan. Therefore, the 2000 Order

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<sup>1</sup> In a letter dated May 23, 2017, provided by DEQ in response to Siltronic's submittal of its Revised Source Control Evaluation Work Plan, DEQ requested that "future related submittals appropriately reference stormwater source control only." Siltronic is happy to oblige and will hereafter refer to this work as Stormwater Source Control Evaluation (SSCE).

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Monthly Progress Reports will include the SSCE efforts, and those activities related to the Gasco Operable Unit (GOU)–Allen property.

## **ACTIONS TAKEN UNDER THE 2000 JOINT ORDER SINCE THE PREVIOUS PROGRESS REPORT**

### Communications and Submittals

On August 1, MFA notified DEQ by email that field activities were postponed until August 14 through 23, 2017 due to extreme temperatures.

On August 8, MFA received by email DEQ comments on the June 19<sup>th</sup>, 2017 letter prepared by MFA on behalf of Siltronic containing technical comments on NW Natural's DNAPL Monitoring Summary Report – 2016 dated April 7, 2017.

On August 10, MFA submitted a monthly progress report to DEQ for work performed by MFA on behalf of Siltronic in July 2017, pursuant to the 2000 Joint Order.

On August 15, MFA, on behalf of Siltronic, submitted to DEQ via email a technical memorandum titled “Results of the groundwater intrusion pathway assessment for the Siltronic Stormwater Source Control Evaluation” as required by DEQ for the Stormwater Source Control Evaluation.

On August 15, MFA, on behalf of Siltronic, submitted to DEQ via email a technical memorandum titled “Results of the overland flow assessment for the Siltronic Stormwater Source Control Evaluation” as required by DEQ for the Stormwater Source Control Evaluation.

On August 24, DEQ confirmed receipt via email of the Overland Flow and Groundwater Intrusion Assessment Memos submitted on August 15, 2017 and referenced above.

### Fieldwork

On August 1, MFA downloaded data from groundwater transducers installed in select monitoring wells.

On August 14 and 17, MFA conducted monitoring of Siltronic groundwater wells, consistent with the DEQ-approved performance monitoring program.

On August 15, 2017, MFA conducted bimonthly thickness measurements of Portland Gas & Coke (PG&C) waste DNAPL in WS-15-85, WS-33-81, and WS-43-36.

On August 23, MFA collected bimonthly combustible-gas measurements in support of the ongoing performance monitoring program, as required by DEQ.

On August 23, MFA collected bimonthly soil vapor samples, consistent with the ongoing performance monitoring program required by DEQ.

During August, Siltronic provided access, as necessary, to representatives of NWN for work associated with the NWN source control measures.

## **ACTIONS TO BE TAKEN IN THE NEXT TWO MONTHS**

### Communications and Submittals

No communications or submittals are scheduled during the next two months.

### Fieldwork

DEQ has directed NWN to take over Siltronic's groundwater performance monitoring on the GOU-Allen and likewise has ordered Siltronic to take over sampling of six NWN wells on the SOU, even absent a DEQ-approved work plan. Siltronic is working with NWN on preparing the requisite access agreement(s) necessary to make this sampling possible. Sampling will begin as soon as the above-referenced access agreement(s) are in place.

September field activities will include quarterly groundwater monitoring.

October field activities will include quarterly water level measurements; bimonthly PG&C waste DNAPL thickness measurements at selected wells (WS-15-85, WS-33-81, and WS-43-36); groundwater performance monitoring; bimonthly combustible-gas measurements; and bimonthly and semiannual vapor sampling.

Weather permitting, stormwater sampling will be conducted consistent with the Revised SSCE Work Plan approved by DEQ.

## **TEST RESULTS AND DATA RECEIVED**

The attached Microsoft® (MS) Excel® data file contains performance and quarterly groundwater monitoring data, as well as the soil vapor data received through the end of the reporting period.

## **PROBLEMS EXPERIENCED OR RESOLVED**

No problems were experienced during the reporting period.

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Please call Michael Murray at (971) 544-2139 if you have any questions or comments regarding the contents of this month's progress report.  
Sincerely,

Maul Foster & Alongi, Inc.



Michael R. Murray, RG, EIT  
Senior Hydrogeologist

Attachment/enclosure: MS Excel file (as attachment to the e-mail and on CD with the hard copy)

cc: Myron Burr, Siltronic  
Ilene M. Munk, Foley & Mansfield  
Chris Reive and David Rabbino, Jordan Ramis  
Keith Johnson, DEQ  
Paul Siedel, DEQ  
Henning Larsen, DEQ  
Matt McClincy, DEQ  
Eva DeMaria, USEPA  
Sean Sheldrake, USEPA  
Rene Fuentes, USEPA  
Lance Peterson, CDM  
Bob Wyatt, NWN  
Patty Dost, Pearl Legal Group LLC  
John Edwards, Anchor QEA LLC  
John Verduin, Anchor QEA LLC  
Carl Stivers, Anchor QEA LLC  
Ben Hung, Anchor QEA LLC  
John Renda, Anchor QEA LLC  
Jen Mott, Anchor QEA LLC  
Halal Voges, Anchor QEA LLC  
Taku Fuji, Anchor QEA LLC  
Rob Ede, Hahn and Associates, Inc.

# ATTACHMENT

MS EXCEL FILE

